

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

Civil Action No. 2:23-CV-00352-JRG-RSP

DEFENDANTS' NOTICE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282(c), Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, "Verizon") provide this notice (the "Section 282 Notice") to Plaintiff Headwater Research LLC ("Plaintiff") of patents, publications, other prior art, and witnesses upon which Verizon rely to establish the invalidity and the state of the art as to U.S. Patent Nos. 8,589,541 (the "'541 Patent"), 9,215,613 (the "'613 Patent"), and 9,198,042 (the "'042 Patent") (together, the "Asserted Patents").

Verizon has already provided the requisite notice through the pleadings and documents filed or served over the course of this litigation, including but not limited to its answer to the complaint, initial disclosures, invalidity contentions, expert reports, discovery responses, fact and expert depositions, trial exhibit lists, trial witness lists, and all documents cited or relied upon therein (collectively, the "Prior Notice"). These pleadings and documents comprising the Prior Notice include the information that Section 282 requires with respect to the patents, publications, other prior art, and witnesses upon which Verizon intends to rely to establish the invalidity and the state of the art as to the asserted claims of the Asserted Patents. Verizon therefore incorporates by

reference the Prior Notice into this Section 282 Notice as if fully set forth herein. For the same reason, Verizon incorporates by reference into this Section 282 Notice all prior art cited or otherwise contained in the prosecution records of the applications that issued as the Asserted Patents, as well as any related applications that were filed in the United States or world.

In addition, Verizon identifies the following patents, publications, other prior art, and trial witnesses who may testify in connection with Verizon's contentions as to invalidity of the Asserted Patents.

I. Prior Art

A. Patents, Patent Publications, or Patent Applications

Country	Patent / Publication / Application No.	Date Filed / Published / Issued	Name of Patentee / Applicant
U.S.	U.S. Patent Publication No. 2009/0265752	October 22, 2009,	Sharif-Ahmadi
U.S.	U.S. Patent Publication No. 2008/0080458	April 3, 2008	Cole
U.S.	U.S. Patent Publication No. 2006/0039354	February 23, 2006	Rao
U.S.	U.S. Patent Publication No. 2008/0084977	April 10, 2008	Nayak
U.S.	U.S. Patent Publication No. 2010/0017506	January 21, 2010	Fadell
U.S.	U.S. Patent Publication No. 2009/0207817	August 20, 2009	Montemurro
U.S.	U.S. Patent Publication No. 2007/0038763	February 15, 2007	Oestvall
EP	European Patent No. 1,484,871 A1	December 8, 2004	Kelz
U.S.	U.S. Patent Publication No. 2008/0160958	July 3, 2008	Abichandani
U.S.	U.S. Patent Publication No. 2009/0217065	August 27, 2009	Araujo
U.S.	U.S. Patent Publication No. 2011/0078767	March 31, 2011	Cai
U.S.	U.S. Patent No. 5,987,611	November 16, 1999	Freund
U.S.	U.S. Patent Publication No. 2008/0146268	June 19, 2008	Gandhi

Country	Patent / Publication / Application No.	Date Filed / Published / Issued	Name of Patentee / Applicant
U.S.	U.S. Patent Publication No. 2006/0059556	March 16, 2006	Royer
U.S.	U.S. Patent No. 8,381,127	February 19, 2013	Singh
U.S.	U.S. Patent Publication No. 2010/0223096	September 2, 2010	Bosan
U.S.	U.S. Patent Publication No. 2004/0073672	April 15, 2004	Fascenda
U.S.	U.S. Patent Publication No. 2007/0156897	July 5, 2007	Lim
U.S.	U.S. Patent Publication No. 2004/0243682	December 2, 2004	Markki
U.S.	U.S. Patent Publication No. 2012/0157038	June 21, 2012	Menezes
U.S.	U.S. Patent Publication No. 2011/0231890	September 22, 2011	Torvar
U.S.	U.S. Patent Publication No. 2005/0105467	May 19, 2005	True
U.S.	U.S. Patent Publication No. 2012/0117478	May 10, 2012	Vadde
U.S.	U.S. Patent Publication No. 2010/0312892	December 9, 2010	Woundy
U.S.	U.S. Patent No. 9,167,480	May 17, 2011	Erman
U.S.	U.S. Patent Publication No. 2007/0021113	January 25, 2007	Hamasaki
U.S.	U.S. Patent Publication No. 2007/0288989	December 13, 2007	Aarnos
U.S.	U.S. Patent Publication No. 2006/0223495	October 5, 2006	Cassett
U.S.	U.S. Patent Publication No. 2009/0300596	May 28, 2008	Tyhurst
U.S.	U.S. Patent No. 10,694,385	June 23, 2020	Raleigh
U.S.	U.S. Patent Publication No. 2006/0183461	August 17, 2006	Pearce
U.S.	U.S. Patent No. 7,849,310	December 7, 2010	Watt
U.S.	U.S. Patent Publication No. 2006/0112427	May 25, 2006	Shahbazi
U.S.	U.S. Patent Publication No. 2006/0224742	October 5, 2006	Shahbazi

B. Other Prior Art

System, Publication, or Other Document	Bates Beg	Bates End
Android Devices, Applications, and Operating Systems	N/A	N/A
A T-Mobile G1 device	N/A	N/A
An HTC Nexus One device	N/A	N/A
An HTC Hero device	N/A	N/A
A T-Mobile myTouch 3G device	N/A	N/A
Android OS Version 1.6, R1	VZN-HW5003611	VZN-HW5003611
Android OS Version 1.6, R2	VZN-HW5003612	VZN-HW5003612
Google I/O Presentation “Coding for Life – Battery Life, That Is” (Slides)	GOOG-HDWTER-00000001	GOOG-HDWTER-00000032
Google I/O Presentation “Coding for Life – Battery Life, That Is” (Video)	GOOG-HDWTER-00000033	GOOG-HDWTER-00000033
Gmail	N/A	N/A
JuiceDefender	N/A	N/A
J. Walton, DroidDog, App(s) Review: JuiceDefender & UltimateJuice	VZN-HW5003519	VZN-HW5003521
K. Purdy, LifeHacker, JuiceDefender Saves Batteries by Automating Android Data	VZN-HW0188938	VZN-HW0188942
Latedroid, JuiceDefender – Battery Saver	VZN-HW5003620	VZN-HW5003627
Latedroid, JuiceDefender Changelog	VZN-HW5003628	VZN-HW5003632
Latedroid, JuiceDefender	VZN-HW5003637	VZN-HW5003665
D. Ruddock, Android Policy, Top Android Apps Every Rooted User Should Know About, Part 1: Apps 1-8	VZN-HW0188943	VZN-HW0188960
HTC Dream/T-Mobile G1 User Guide	VZN-HW0188796	VZN-HW0188936
T-Mobile myTouch 3G Slide Manual	VZN-HW0189214	VZN-HW0189395
Motorola Droid User Guide	VZN-HW0189035	VZN-HW0189092
HTC Nexus One User’s Guide	VZN-HW0189396	VZN-HW0189729
T-Mobile G1 Full Phone Specifications	VZN-HW0189197	VZN-HW0189198
About 3GPP, https://www.3gpp.org/about-us	VZN-HW5005881	VZN-HW5005886
Working Procedures, http://www.3gpp.org/specificationsgroups/working-procedures	VZN-HW5005887	VZN-HW5005888
Hillebrand, F., GSM and UMTS: The Creation of Global Mobile Communication (2002), ch. 9.	VZN-HW5005802	VZN-HW5005806
Delegates Corner, http://www.3gpp.org/specificationsgroups/delegates-corner	VZN-HW5005933	VZN-HW5005939

System, Publication, or Other Document	Bates Beg	Bates End
3GPP FAQs, http://www.3gpp.org/contact/3gpp-faqs	VZN-HW5005940	VZN-HW5005946
3GPP Specifications By Series, https://www.3gpp.org/specificationstechnologies/specifications-by-series	VZN-HW5005947	VZN-HW5005954
3GPP TS 22.022 v3.0.1 (1999-10)	VZN-HW5005232	VZN-HW5005252
3GPP TS 23.002 v8.4.0 (2008-12)	VZN-HW0389587	VZN-HW0389754
3GPP TS 23.060 v3.2.0 (1999-12)	VZN-HW2565085	VZN-HW2565262
3GPP TS 23.060 v8.3.0 (2008-12)	VZN-HW0383864	VZN-HW0384134
3GPP TS 23.401 v8.0.0 (2007-12)	VZN-HW0379968	VZN-HW0380188
3GPP TS 23.401 v8.4.0 (2008-12)	VZN-HW0355598	VZN-HW0355816
3GPP TS 24.008 v3.0.0 (1999-07)	VZN-HW2559019	VZN-HW2559103
3GPP TS 24.008 v8.4.0 (2008-12)	VZN-HW0381398	VZN-HW0381802
3GPP TS 24.301 v8.0.0 (2008-12)	VZN-HW0379968	VZN-HW0380188
3GPP TS 29.272 v8.0.0 (2008-09)	VZN-HW5005253	VZN-HW5005301
3GPP TS 33.102 v3.0.0 (1999-04)	VZN-HW2560300	VZN-HW2560354
3GPP TS 33.102 v8.0.0 (2008-06)	VZN-HW2560451	VZN-HW2560515
3GPP TS 33.102 v8.1.0 (2008-12)	VZN-HW0376974	VZN-HW0377038
3GPP TS 31.101 v8.0.0 (2009-01)	VZN-HW2561082	VZN-HW2561091
3GPP TS 31.102 v3.1.0 (2000-03)	VZN-HW2560965	VZN-HW2561080
3GPP TS 31.102 v4.4.0 (2002-03)	VZN-HW5005302	VZN-HW5005440
3GPP TS 31.102 v8.0.0 (2007-12)	VZN-HW2563355	VZN-HW2563540
3GPP TS 36.331 v8.4.0 (2008-12)	VZN-HW5005441	VZN-HW5005638
3GPP TS 23.203 v8.4.0 (2008-12)	VZN-HW0373759	VZN-HW0373869
3GPP TR 21.905 v8.7.0 (2008-12)	VZN-HW0381341	VZN-HW0381397
ItsOn, Network Product Development, August 4, 2011	VZN-HW0345827	VZN-HW0345846
Quarterly Staff Meeting Update	VZN-HW0345608	VZN-HW0345631
Technology Update, August 29, 2011	VZN-HW0345632	VZN-HW0345649
ItsOn Christmas Carol, Dec. 2011	HW352-00011276	HW352-00011284

System, Publication, or Other Document	Source
Bharti Kalra & D. K. Chauhan, A Comparative Study of Mobile Wireless Communication Network: 1G to 5G, 2 Int'l J. Comput. Sci. & Info. Tech. Rsch., 430 (2014)	https://www.researchgate.net/publication/318673817_A_Comparative_Study_of_Mobile_Wireless_Communication_Network_1G_to_5G
Overview of Cellular Mobile Network Standards, 1NCE	https://1nce.com/en-us/resources/news/blog/cellular-mobile-standards
Mobile Communications Standard, Everphone	https://everphone.com/en/wiki/mobile-communications-standard

System, Publication, or Other Document	Source
Shanzhi Chen, Jian Zhao, & Ying Peng, The Development of TD-SCDMA 3G to TD-LTE-Advanced 4G from 1998 to 2013, 21 IEEE Wireless Communications 167 (2014)	https://www.researchgate.net/publication/273191880 <u>The development of TD-SCDMA 3G to TD-LTE-advanced 4G from 1998 to 2013</u>
Adnan Ghayas, 3G UMTS Networks: What Is UMTS And Why Does It Use WCDMA, COMSBRIEF (2021),	https://commsbrief.com/3g-umts-networks-what-is-umts-and-why-does-it-use-wcdma/
IP Europe, What Are Cellular Communications Standards?	https://ipeurope.org/policy/europes-open-standards-development-model/what-are-cellular-communications-standards/
R. Gazzo, Timeline from 1G to 5G: A Brief History on Cell Phones, CENG N	https://www.cengn.ca/information-centre/innovation/timeline-from-1g-to-5g-a-brief-history-on-cell-phones/
Julie McDaniel, Unraveling the Wireless Future: What is a Wireless WAN (WWAN)?, Perle (May 22, 2024),	https://www.perle.com/articles/what-is-a-wireless-wan-wwan.shtml
Nisarg Gandhewar & R. Sheikh, Google Android: An Emerging Software Platform For Mobile Devices, Int. J. Comput. Sci. Eng. (2009)	https://www.researchgate.net/publication/313558348 <u>Google android An emerging software platform for mobile devices</u>
Reto Meier, Google I/O 2010 – A Beginner’s Guide to Android, YouTube	https://www.youtube.com/watch?v=yqCj83leYRE
Pocketnow, Android Quick Tip: Data Roaming, YouTube	https://www.youtube.com/watch?v=bnrKr9XINRQ
Virgil Dobjanschi, Google I/O 2010 - Android REST Client Applications, YouTube	https://www.youtube.com/watch?v=xHXn3Kg2IQE
Google Patents, Patents citing U.S. Patent Pub. No. 2006/0223495	https://patents.google.com/patent/US20060223495A1/en?q=2006%2f0223495#citedBy
Google Patents, Patents citing U.S. Patent No. 9,198,042	https://patents.google.com/patent/US9198042B2/en?q=9198042#citedBy
Google Patents Search Result: LTE	https://patents.google.com/?q=(LTE)&country=US

II. Persons To Be Identified Under 35 U.S.C. § 282(c)

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Verizon reserves the right to supplement or to modify this Section 282 Notice through and including the time of trial.

Dated: May 23, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2025, the foregoing was served upon all counsel of record who have consented to electronic service.

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